



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONEL TORRES GOMEZ,
aka "Leonel Gomez Torres,"
aka "Leonel Gomez,"
aka "Leonel Torres,"
aka "Leone Gomez Torres,"
aka "Jose Buenrostro,"
aka "Jose Buenromo," and
ERICK ANTHONY ELLIS, JR.,
aka "Kameron Gordon,"

Defendants.

CR 2:22-cr-00298-SB

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(ii): Distribution of,
and Possession with Intent to
Distribute, Cocaine; 21 U.S.C.
§ 860(a): Distribution of, and
Possession with Intent to
Distribute, Cocaine Within 1,000
Feet of a School; 21 U.S.C. § 853:
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)]

[DEFENDANT TORRES]

On or about August 12, 2020, in Los Angeles County, within the
Central District of California, defendant LEONEL TORRES GOMEZ, also
known as ("aka") "Leonel Gomez Torres," aka "Leonel Gomez," aka
"Leonel Torres," aka "Leone Gomez Torres," aka "Jose Buenrostro," aka

1 "Jose Buenromo," knowingly and intentionally distributed at least
2 five kilograms, that is, approximately 8.99 kilograms, of a mixture
3 and substance containing a detectable amount of cocaine, a Schedule
4 II narcotic drug controlled substance.

COUNT TWO

[21 U.S.C. § 860(a)]

[DEFENDANT TORRES]

On or about August 12, 2020, in Los Angeles County, within the Central District of California, defendant LEONEL TORRES GOMEZ, aka "Leonel Gomez Torres," aka "Leonel Gomez," aka "Leonel Torres," aka "Leone Gomez Torres," aka "Jose Buenrostro," aka "Jose Buenromo," knowingly and intentionally distributed at least five kilograms, that is, approximately 8.99 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii), at an auto shop at 5150 South Vermont, in Los Angeles, California, which is within 1,000 feet of the real property comprising schools, namely, Esther Collins Early Education Center, located at 901 West 52nd Street, in Los Angeles, California, and ICEF Innovation Los Angeles Charter School, located at 5029 South Vermont Avenue, in Los Angeles, California.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)]

[DEFENDANT ELLIS]

On or about August 12, 2020, in Los Angeles County, within the Central District of California, defendant ERICK ANTHONY ELLIS, JR., aka "Kameron Gordon," knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 8.99 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. § 860(a)]

[DEFENDANT ELLIS]

On or about August 12, 2020, in Los Angeles County, within the Central District of California, defendant ERICK ANTHONY ELLIS, JR., aka "Kameron Gordon," knowingly and intentionally possessed with intent to distribute at least five kilograms, that is, approximately 8.99 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii), at an auto shop at 5150 South Vermont, in Los Angeles, California, which is within 1,000 feet of the real property comprising schools, namely, Esther Collins Early Education Center, located at 901 West 52nd Street, in Los Angeles, California, and ICEF Innovation Los Angeles Charter School, located at 5029 South Vermont Avenue, in Los Angeles, California.

FORFEITURE ALLEGATION

[21 U.S.C. § 853]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Four this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), any defendant so convicted shall forfeit substitute property if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in

value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

/S/

Foreperson

STEPHANIE S. CHRISTENSEN
Acting United States Attorney



SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

JOANNA M. CURTIS
Assistant United States Attorney
Chief, Violent & Organized Crimes
Section

JEFFREY M. CHEMERINSKY
Assistant United States Attorney
Deputy Chief, Violent & Organized
Crimes Section

KATHY YU
Assistant United States Attorney
Violent & Organized Crimes
Section